

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BRANDON–MEION BROWN,
as Next Friend to
PETER–EUGENE ALVARADO,
Plaintiff,

v.

BRAZORIA COUNTY, TEXAS,
Defendant.

Civil Action No. 4:25-cv-03231

PLAINTIFF'S SECOND AMENDED COMPLAINT

I. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343 because this action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983, Title II of the Americans with Disabilities Act (ADA), 42 U.S.C. § 12132, and § 504 of the Rehabilitation Act.

Venue is proper under 28 U.S.C. § 1391(b) because the events giving rise to these claims occurred in Brazoria County, Texas.

II. PARTIES

Plaintiff Brandon–Meion Brown brings this action as Next Friend to Peter–Eugene Alvarado, who was a minor at the time of the events.

Defendant Brazoria County, Texas is a political subdivision of the State of Texas and is responsible for the policies, customs, training, supervision, and operation of the Brazoria County Jail.

III. FACTUAL ALLEGATIONS

Peter–Eugene Alvarado was a minor with a documented cognitive/intellectual disability and a serious cardiac condition.

Despite this knowledge, Brazoria County failed to provide reasonable accommodations necessary for safety and meaningful access to custodial processes.

IV. ADA & REHABILITATION ACT

Brazoria County failed to make reasonable modifications to policies and procedures, resulting in discrimination on the basis of disability.

V. MUNICIPAL LIABILITY (MONELL)

The violations were caused by Brazoria County's policies, customs, or practices, including failure to train and supervise jail personnel.

VI. FOURTEENTH AMENDMENT – DUE PROCESS

As a minor and pretrial detainee, Alvarado had a constitutional right to reasonable safety, medical care, and protection from harm.

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Nathan Ochisner, Clerk of Court
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VII. DAMAGES

Plaintiff seeks compensatory, statutory, and other damages as permitted by law.

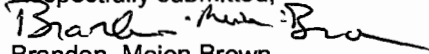
VIII. PRAYER FOR RELIEF

Plaintiff requests judgment in his favor, damages, costs, fees, injunctive and declaratory relief, and all other just relief.

IX. JURY DEMAND

Plaintiff demands a jury trial on all issues so triable.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brandon-Meion Brown", is written over the typed name.

Brandon-Meion Brown

Plaintiff, Pro Se (Next Friend)

P.O. Box 84

Clute, Texas 77531